

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1236, 1346, & 1350

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING THE FOURTH
NOTICE OF (A) BID DEADLINE, (B) SALE HEARING, AND (C) POTENTIAL
ASSUMPTION AND ASSIGNMENT OF CERTAIN UNEXPIRED LEASES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On November 25, 2024, the Debtors filed the *Fourth Notice of (A) Bid Deadline, (B) Sale Hearing, and (C) Potential Assumption and Assignment of Certain Unexpired Leases* [D.I. 1236] (“**Fourth Lease Sale Notice**”).

2. On December 13, 2025, 5620 Nolensville Pike, LLC (“**Nolensville**”) filed the *Objection of 5620 Nolensville Pike, LLC to Proposed Assignment of Lease to Burlington Coat Factory Warehouse Corporation* [D.I. 1346] (the “**Nolensville Objection**”).

3. On December 13, 2025, Ross Stores, Inc. (“**Ross**”) also filed *Ross Stores, Inc.’s Objection to the Debtors’ Fourth Notice of Successful Bidders with Respect to the Auction*

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

of Certain of the Debtors' Lease Assets and Assumption and Assignment of Certain Unexpired Leases [D.I. 1350] (the “**Ross Objection**”).

4. Both the Nolensville Objection and the Ross Objection (together the “**Objections**”) relate to Store #5216 located within the South Plaza Shopping Center at 5702 Nolensville Road, Nashville, Tennessee 37211 (the “**Nolensville Lease**”).

5. On December 20, 2024, the Court entered the *Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Terminate or Assume, Assign and Sell Certain Non-Residential Real Property Leases* [D.I. 1410] (the “**December Lease Sale Order**”), which approved the disposition of the leases included in the Fourth Lease Sale Notice, excluding the Nolensville Lease.

6. On January 21, 2025, the Court held a hearing to consider the Objections and the disposition of the Nolensville Lease. The Court overruled the Objections at the hearing and instructed the parties to submit a proposed order under certification of counsel.

7. On February 4, 2025, the Debtors filed the *Certification of Counsel Regarding the Fourth Notice of Successful Bidders with Respect to the Auction of Certain of the Debtors' Lease Assets and Assumption and Assignment of Certain Unexpired Leases* [D.I. 1929]. A copy of the proposed order (the “**Proposed Order**”) was attached thereto.

8. In response to comments received from the Court to the Proposed Order, the Debtors have further revised the Proposed Order. A copy of the further revised proposed form of order (the “**Revised Proposed Order**”) is attached hereto as **Exhibit 1**. The Debtors provided the Revised Proposed Order to counsel for the purchaser, Nolensville, and Ross. Counsel for the purchaser, Nolensville, and Ross confirmed that they have no objection to the form of the Revised Proposed Order.

9. For the convenience of the Court and all parties in interest, a redline of the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtors respectfully request that the Court enter the Revised Proposed Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

[Signature page follows]

Dated: February 6, 2025
Wilmington, Delaware

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